



Browning-Ferris Industries

Browning-Ferris Industries of Ohio, Inc.
33 North Wickliffe Circle
Youngstown, Ohio 44515



June 9, 1981

U.S. EPA Region 5
Sites Notification
Chicago, Illinois 60604

Dear Gentlemen:

Pursuant to Section 103(c) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), Browning-Ferris Industries of Ohio, Inc. (hereinafter, together with its predecessors, is referred to as the "Company") hereby submits notifications (EPA Form 8900-1) for facilities it owns(ed) or operates(ed) and which are located at the following addresses:

- | | | |
|----|---------------|------------------------|
| 1) | Warner Road | Garfield Heights, Ohio |
| 2) | Richmond Road | Glenwillow, Ohio |
| 3) | Miller Road | Avon Lake, Ohio |
| 4) | Ford Road | Elyria, Ohio |

In addition, Company submits such notifications for the following facilities, which were never owned or operated by the Company, but which were selected by Company for the disposal of hazardous wastes.

- | | | |
|----|----------------------------|---------------------|
| 1) | Erie County Landfill | Avery, Ohio |
| 2) | Camp Perry Landfill | Port Clinton, Ohio |
| 3) | Crawford County Landfill | Bucyrus, Ohio |
| 4) | Ashland County Landfill | Ashland, Ohio |
| 5) | City of Mansfield Landfill | Mansfield, Ohio |
| 6) | Summit National Services | Deerfield TWP, Ohio |
| 7) | Laskins Waste Oil | Jefferson, Ohio |
| 8) | Lorain City Landfill | Lorain, Ohio |
| 9) | Elyria City Landfill | Elyria, Ohio |

Please be advised that while EPA Form 8900-1 is being utilized by the Company for purposes of complying with the Section 103(c) notification requirement, some revisions to the form have been made which we believe more appropriately reflect the type of information being submitted. Also, please be advised that some of the facilities listed above are [were] operated as sanitary landfills which generally receive(d) commercial,

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industrial wastes as well as household wastes. Company procedures are designed to preclude the receipt of identifiable hazardous wastes at those sanitary landfills it owns or operates. Similarly, the Company has instituted procedures designed to preclude the transportation of such wastes to third party (i.e., third party or municipally owned/operated) sanitary landfills.

However, several factors have made, and continue to make, it impossible to know for certain whether any wastes, now deemed by regulation to be hazardous inherently or by virtue of their quantity, have ever been unknowingly received at any of the sanitary landfills owned or operated by the Company. Nor is it possible to know for certain whether the Company has unknowingly transported such wastes to any of these facilities.

- o Several of the Company facilities listed above were acquired from individuals or companies who may not have instituted the same operating procedures as the Company.
- o Prior to November 19, 1980, few states or local governments required generators of hazardous wastes to determine if their wastes were hazardous. Nor were they required to inform off-site commercial transporters or landfill owners/operators such as the Company of the type or quantity of such wastes received for off-site disposal.
- o After November 19, 1980, only large generators of hazardous wastes were required to notify off-site commercial transporters and landfill owners/operators of the type and quantity of hazardous wastes received for off-site disposal.
- o Both before and after November 19, 1980, federal and state law have permitted the disposal of small quantities of hazardous wastes at sanitary landfills.

Therefore, the Company has submitted notification forms for sanitary landfills it owns(ed) or operates(ed) only if the Company has any actual knowledge or a reasonable basis to believe that some of the wastes received at the facility contained substances now classified as hazardous. Similarly, the Company has reported third party owned/operated sanitary landfills which the Company selected and to which it transported commercial, industrial or residential wastes, only if the Company has actual knowledge or a reasonable basis to believe that some of such wastes contained substances which would now be classified as hazardous.

We are not reporting sanitary landfills owned or operated by the Company which are or were permitted to receive residential, commercial and industrial solid wastes if, after reasonable inquiry, we were unable to obtain information that wastes received contained substances which, unknown to us, are now classified as hazardous. However, for your information, we are listing these sanitary landfills below. Since the Company has no reason to believe such hazardous wastes were ever received at these facilities, and, therefore, it is not required to report them under section 103 of CERCLA, the Company believes that these facilities cannot be included in any list published by U.S. EPA as having received hazardous wastes.

In accordance with the public notice of the availability of Form 8900-1, 46 Fed. Reg. 22144 (April 15, 1981), the Company has not included facilities for which there has been previously filed a notification of hazardous waste activities and/or a "Part A" permit application as required by Sections 3005 and 3010 of the Resource Conservation and Recovery Act (RCRA).

Should you have any questions, please do not hesitate to contact the undersigned or Jim Scheline at (713) 870-8100.

Sincerely,


Stephen L. Thomas
Vice President

SLT/mbe

F Waste Quantity:

Place an X in the appropriate boxes to indicate the facility types found at the site.

In the "total facility waste amount" space give the estimated combined quantity (volume) of hazardous wastes at the site using cubic feet or gallons.

In the "total facility area" space, give the estimated area size which the facilities occupy using square feet or acres.

Facility Type

- 1. Piles
- 2. Land Treatment
- 3. Landfill
- 4. Tanks
- 5. Impoundment
- 6. Underground Injection
- 7. Drums, Above Ground
- 8. Drums, Below Ground
- 9. Other (Specify)

Total Facility Waste Amount

cubic feet UNKNOWN

gallons "

Total Facility Area

square feet

acres 100

G Known, Suspected or Likely Releases to the Environment:

Place an X in the appropriate boxes to indicate any known, suspected, or likely releases of wastes to the environment.

- Known ^{Unknown} ~~Suspected~~ Likely None

Note: Items Hand I are optional. Completing these items will assist EPA and State and local governments in locating and assessing hazardous waste sites. Although completing the items is not required, you are encouraged to do so.

H Sketch Map of Site Location: (Optional)

Sketch a map showing streets, highways, routes or other prominent landmarks near the site. Place an X on the map to indicate the site location. Draw an arrow showing the direction north. You may substitute a publishing map showing the site location.

I Description of Site: (Optional)

Describe the history and present conditions of the site. Give directions to the site and describe any nearby wells, springs, lakes, or housing. Include such information as how waste was disposed and where the waste came from. Provide any other information or comments which may help describe the site conditions.

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*J "The information contained herein is based upon the personal knowledge or recollection of the individual compiling the information or upon records or other informational sources reasonably available to him (see item C). The information herein is accurate and complete to the best of the knowledge and belief of the submitter. The indication in Item E, numbers 9 and 10 does not constitute an admission that such wastes, if they exist, are in fact hazardous. The indication in Item G that a release is "known" or "likely" does not constitute an admission that such release is either continuing or, if it is, that it poses a threat to human health or the environment."

***J Signature and Title:**

The person or authorized representative (such as plant managers, superintendents, trustees or attorneys) of persons required to notify must sign the form and provide a mailing address (if different than address in item A). For other persons providing notification, the signature is optional. Check the boxes which best describe the relationship to the site of the person required to notify. If you are not required to notify check "Other".

Name Stephen L. Thomas, Vice-President

Street _____

City _____ State _____ Zip Code _____

Signature Stephen L. Thomas Date 6/9/81

- Owner, Present
- Owner, Past
- Transporter
- Operator, Present
- Operator, Past
- Other



Browning-Ferris Industries, Inc.

P. O. BOX 3151 / HOUSTON, TEXAS 77001



Browning-Ferris Industries, Inc.

FANNIN BANK BLDG. • P. O. BOX 3151 • HOUSTON, TEXAS 77001

TO

U. S. E P A Region 5
Sites Notification
Chicago, Ill. 60604



**RETURN RECEIPT
REQUESTED**

CERTIFIED

P14 1005386

MAIL